

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
GALVESTON DIVISION

United States Courts
Southern District of Texas
FILED

KENNETH TAYLOR,
TOLJ # 828757,

DEC 10 2018

David J. Bradley, Clerk of Court

VS.

CIVIL ACTION NO. 3:17-CV-0358

BRYAN COLLIER, et al,

PLAINTIFFS RESPONSE AND
GENERAL DENIAL TO DEFENDANTS
RESPONSE TO THE COURTS ORDER FOR
EXPEDITED RESPONSE DATED THE
20th DAY OF NOVEMBER, 2018.

TO THE HONORABLE JUDGE OF THE SAID COURT:
Now, COMES KENNETH TAYLOR, Prose Plaintiff in the above
Civil action and makes this General Denial of any Response and
Request for the following reasons:

REASON 1: As of the 3rd day of December 2018, The Plaintiff
has not been served any Response by the defendant in regard to
the courts order of November 20, 2018. This can only be, because
the defendant failed to (a) respond to the court order; (b) failed to
serve a copy of their response on the plaintiff; or (c) The C.T. Terrell
Mail Room, run by the defendant are withholding plaintiffs legal mail;
or have destroyed such mail.

REASON 2: In the Plaintiffs Request for Inductive Relief he
shows that he is in need of a Medication Named "Neurotin"
for his Nerve Pain and it is the only medication that will work
that others have been used and as a result have caused other
medical problems. (page 2 of Plaintiffs Motion for Emergency Injunction)
This Medication has not been provide for the Plaintiff.

REASON 3: THE COURT ORDERED (1) Weather TDCJ officials have complied with relevant medical instructions regarding housing. The above mentioned officials/defendants did not comply with this medical instruction until November 21, 2018 the day after this court made its order.

The above mentioned officials/defendant believe they are above the law to an point that they will deny medical request such as these to the point that will cause death.

The Plaintiff has attached a copy of his official House/Job Change Date 11/21/2018 This is to be plaintiffs Exhibit A.

REASON 4: The Medications as ordered element 5#2 in the order is only being met for those that the specialist at hospital Galveston have "not" requested.

The specialist at Hospital Galveston, Doctor Varun B. Shah requested that the Plaintiff get "Neurotin" 300 mg T.I.D. In this request for the medication, "he state its the only medication that will work for the Plaintiff."

This medication is for Nerve Pain in the Plaintiff Left Leg do to Peralization from stroke in 2014 and ongoing issues. The reason its the only medication, that will work is because the medications that TDCJ provide for such (a) cause the Plaintiff to have bad reactions such as seizure like episodes or sleepless night, (b) These are Ophric drugs that cause effect that are harmful to the Plaintiff.

Therefore this is the only drug that will help the Plaintiff!

CONCLUSION

In conclusion the Plaintiff would like to point out that the only reason the defendant Move the Plaintiff was because it has become very clear through the courts order that if they did not.

move the Plaintiff the court would have ordered it done.

The Plaintiff would like to point out that the defendant truly believe they are above the law in their actions with respect to the medical needs of the inmates at the C.T. Terrell Unit. If at any moment the defendant believe they are no longer in danger of this courts Actions they will again move the plaintiff outside his ability to the unit facilities.

The Plaintiff would also state that C.T. Terrell unit is a Medical Unit and that Unit classification and the medical department should work hand-in-hand with one another, but they dont. In fact its common practice to remove restriction and force inmates that are sick and not able to work, to work in the C.T. Terrell Camers. This Camery is more like Slave Labor.

The last thing the plaintiff would like to point out is that at no point should he or any other inmate have to turn to the federal courts for a constitutionally protected right of medical care such as I have. I'm now been subjected to the cost of 2 Filing fees do. to my medical and safety needs and would ask this court to subject those fees to the defendant's

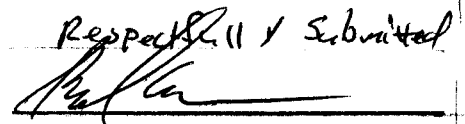
Respectfully

Service



I hereby certify that the defendants have been served by sending a copy to Briona M. Webb Counsel for the defendants at P.O. Box 12548, Austin, Texas, 78711-2548

Respectfully Submitted



12/03/18

Exhibit A

HOUSE/JOB CHANGE

NAME: FAY, JR, KENNETH

NO: 0042517

DATE: 11/01/04 11:25:20

RACE: M

THE ABOVE NAMED AND NUMBERED EMPLOYEE IS TO
BE ASSIGNED AS FOLLOWS:

OLD HOUSE: 004-0210

NEW HOUSE: 404-4417

OLD JOB:

NEW JOB:

INITIATED BY: _____

APPROVED BY: _____

Dec. 03, 2018

Kenneth Taylor #828157
C.T. Terrell
1300 F.M. 655
Rosharon, Texas
77583

United States District Court
Office of the Clerk
401 Rosenberg St. Rm 41
Galveston, Texas

77553-2300

RE: Taylor vs. Collier, et al civil action no. 3:17-cv-0358

Dear Clerk,

Enclosed is a General response to the courts order 11/20/18.
I have yet to get the States Response and they were ordered to
give the court a Response by 5 PM on Nov. 26, 2018.

This being the case I would, ask you to bring this to the
attention to the Judge, because one of my claims and request have to
Mail Room investigated for tampering with my mail.

Respectfully Submitted.



Kenneth Taylor #828757
C. T. Terrell unit
1300 F.W. LSS
Rosharon, Texas
77583

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